

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC, TRIDENT ASSET  
MANAGEMENT, INC., MICHAEL  
DZIURGOT, individually and as the  
representatives of a class of similarly-  
situated persons,  
  
Plaintiff,  
  
v.  
  
ALEBRIJE ENTERTAINMENT LLC,  
CRAIG COLE, MATTHEW COLE,  
GUSTAVO MONTAUDON, and John  
Does 1-10,  
  
Defendants.

## **JOINT STIPULATION OF DISMISSAL**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), plaintiffs AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., MICHAEL DZIURGOT and defendants ALEBRIJE ENTERTAINMENT LLC and GUSTAVO MONTAUDON, parties to this legal action, by and through their attorneys, do hereby jointly stipulate as follows:

1. All claims by AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., MICHAEL DZIURGOT against ALEBRIJE ENTERTAINMENT LLC and GUSTAVO MONTAUDON are **DISMISSED WITH PREJUDICE**.

2. Each party is to bear its own costs and attorneys' fees with respect to this legal action and the entry of this Stipulation

Respectfully submitted,

/s/ Alexander Loftus  
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Attorney for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 13, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Alexander N. Loftus

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